

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RODNEY JONES,

*Plaintiff,*

-against-

SEAN COMBS, JUSTIN DIOR COMBS, ETHIOPIA  
HABTEMARIAM, LUCIAN CHARLES GRAINGE,  
KRISTINA KHORRAM, CHALICE RECORDING  
STUDIOS, LOVE RECORDS, MOTOWN RECORDS,  
UNIVERSAL MUSIC GROUP, COMBS GLOBAL  
ENTERPRISES, JOHN and JANE DOES 1-10 and ABC  
CORPORATIONS. 1-10,

*Defendants.*

Case No.: 24-cv-01457

**WAIVER OF SERVICE OF  
SUMMONS BY MOTOWN  
RECORDS**

**TO:** Tyrone A. Blackburn, Esq. (counsel for Plaintiff, Mr. Rodney Jones)

**PLEASE TAKE NOTICE THAT:**

Notwithstanding the failure by Plaintiff in the above-captioned action either to attempt service of process or to request waiver of service of process pursuant to Fed. R. Civ. P. 4(d), Defendant Motown Records (“Motown”) and its counsel, Pryor Cashman LLP, hereby agree to waive service of process in this Action to save the time and expense of requiring the Plaintiff to serve a summons and complaint in this Action in accordance with Rule 4(d) of the Federal Rules of Civil Procedure.

Accordingly, Motown waives any objections to the absence of the issuance of a summons or service of the summons and complaint, but hereby expressly reserves and does not waive any and all defenses and objections at law or in equity, other than as to service of process, including without limitation as to the lawsuit, the Court’s jurisdiction, and the venue of this Action.

Motown understands that it must file and serve an answer or a motion under Rule 12 within the applicable timeframe provided for in Rule 4(d)(3) and intends to respond to the First Amended Complaint in this Action promptly.

Dated: New York, New York  
March 27, 2024

**PRYOR CASHMAN LLP**

By: 

Donald S. Zakarin  
James A. Janowitz  
William L. Charron  
Nicholas G. Saady  
Alina Jamil Mian

7 Times Square  
New York, New York 10036  
(212) 421-4100  
dzakarin@pryorcashman.com

*Attorneys for Motown*